

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**AUDIT OF
OFFICE OF REFUGEE RESETTLEMENT
GRANT NO. 90RN0002
FOR THE PERIOD
SEPTEMBER 30, 1997 THROUGH
SEPTEMBER 29, 2000**

**HMONG AMERICAN WOMEN
ASSOCIATION, INC.
FRESNO, CALIFORNIA**



**JANET REHNQUIST
INSPECTOR GENERAL**

**NOVEMBER 2001
A-09-01-00106**

Office of Inspector General

<http://www.hhs.gov/oig/>

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

Office of Audit Services

The OIG's Office of Audit Services (OAS) provides all auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations in order to reduce waste, abuse, and mismanagement and to promote economy and efficiency throughout the Department.

Office of Evaluation and Inspections

The OIG's Office of Evaluation and Inspections (OEI) conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The findings and recommendations contained in the inspections reports generate rapid, accurate, and up-to-date information on the efficiency, vulnerability, and effectiveness of departmental programs.

Office of Investigations

The OIG's Office of Investigations (OI) conducts criminal, civil, and administrative investigations of allegations of wrongdoing in HHS programs or to HHS beneficiaries and of unjust enrichment by providers. The investigative efforts of OI lead to criminal convictions, administrative sanctions, or civil monetary penalties. The OI also oversees State Medicaid fraud control units, which investigate and prosecute fraud and patient abuse in the Medicaid program.

Office of Counsel to the Inspector General

The Office of Counsel to the Inspector General (OCIG) provides general legal services to OIG, rendering advice and opinions on HHS programs and operations and providing all legal support in OIG's internal operations. The OCIG imposes program exclusions and civil monetary penalties on health care providers and litigates those actions within the Department. The OCIG also represents OIG in the global settlement of cases arising under the Civil False Claims Act, develops and monitors corporate integrity agreements, develops model compliance plans, renders advisory opinions on OIG sanctions to the health care community, and issues fraud alerts and other industry guidance.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Region IX
Office of Audit Services
50 United Nations Plaza
San Francisco, CA 94102

CIN: A-09-01-00106
November 28, 2001

Chi Kue
Executive Director
Hmong American Women Association, Inc.
4871 E. Kings Canyon Road
Fresno, California 93727

Dear Ms. Kue:

Enclosed are two copies of the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), Office of Audit Services' (OAS) report entitled, "Audit of Office of Refugee Resettlement Grant No. 90RN0002 for the Period September 30, 1997 through September 29, 2000." A copy of this report will be forwarded to the action official noted below for his review and any action deemed necessary.

Final determination as to actions taken on all matters reported will be made by the HHS action official named below. We request that you respond to the HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

In accordance with the principles of the Freedom of Information Act (5 U.S.C. 552, as amended by Public Law 104-231), OIG, OAS reports issued to the Department's grantees and contractors are made available to members of the press and general public to the extent information contained therein is not subject to exceptions in the Act which the Department chooses to exercise. (See 45 CFR Part 5.) As such, within 10 business days after the final report is issued, it will be posted on the world wide web at <http://www.hhs.gov/progorg/oig>.

To facilitate identification, please refer to Common Identification Number A-09-01-00106 in all correspondence relating to this report.

Sincerely,

Lori A. Ahlstrand
Regional Inspector General
for Audit Services

Enclosures

Direct Reply to HHS Action Official:

Mike Hill, ACF Audit Liaison
370 L'Enfant Promenade
Room 6th Floor East Aerospace Building
Washington, D.C. 20447

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**AUDIT OF
OFFICE OF REFUGEE RESETTLEMENT
GRANT NO. 90RN0002
FOR THE PERIOD
SEPTEMBER 30, 1997 THROUGH
SEPTEMBER 29, 2000**

**HMONG AMERICAN WOMEN
ASSOCIATION, INC.
FRESNO, CALIFORNIA**



**JANET REHNQUIST
INSPECTOR GENERAL**

**NOVEMBER 2001
A-09-01-00106**

THIS REPORT IS AVAILABLE TO THE PUBLIC

at <http://www.hhs.gov/progorg/oig>

In accordance with the principles of the Freedom of Information Act, 5 U.S.C. 552, as amended by Public Law 104-231, Office of Inspector General, Office of Audit Services, reports are made available to members of the public to the extent information contained therein is not subject to exemptions in the Act. (See 45 CFR Part 5.)

OAS FINDINGS AND OPINIONS

The designation of financial or management practices as questionable or a recommendation for the disallowance of costs incurred or claimed as well as other conclusions and recommendations in this report represent the findings and opinions of the HHS/OIG/OAS. Final determination on these matters will be made by authorized officials of the HHS divisions.



Region IX
Office of Audit Services
50 United Nations Plaza
Room 171
San Francisco, CA 94102

CIN: A-09-01-00106
November 28, 2001

Chi Kue
Executive Director
Hmong American Women Association, Inc.
4871 E. Kings Canyon Road
Fresno, California 93727

Dear Ms. Kue:

This report provides you with the results of our audit of the Administration for Children and Families (ACF), Office of Refugee Resettlement (ORR) grant number 90RN0002 awarded to Hmong American Women Association, Inc. (Association). The award covered the period from September 30, 1997 through September 29, 2000. The objective of the audit was to determine if the Association accomplished the objectives of the grant.

The Association accomplished the two primary grant objectives. However, the Association's progress reports did not always contain accurate statistics on the numbers of refugees served. We recommend that the Association improve its record keeping procedures to ensure that progress reports show the actual accomplishment of grant objectives. The Association concurred with our recommendation and provided a record keeping improvement plan. We have summarized the Association's comments after the finding discussed in this report. The complete text of the Association's comments is included as the APPENDIX to this report.

INTRODUCTION

BACKGROUND

The Refugee Act of 1980, Public Law 92-212, codified and strengthened the United States policy of aiding individuals fleeing persecution in their homelands. Title IV, Chapter 2 of the Immigration and Nationality Act (INA) contains the provisions of the Refugee Act. The INA provided for a formal definition of "refugee," the foundation for the asylum adjudication process, and the development of ORR within the Department of Health and Human Services.

A "refugee" is defined as:

any person who is outside any country of such person's nationality or, in the case of a person having no nationality, is outside any country in which such person last habitually resided, and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of, that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion.

The ORR's mission is to assist refugees and other special populations in obtaining economic and social self-sufficiency during their resettlement in the United States. To accomplish this, ORR funds and facilitates a variety of programs that offer, among other benefits and services, cash and medical assistance, employment preparation and job placement, skills training, English language training, social adjustment, and aid for victims of torture.

The Association is a nonprofit organization with over 10 years experience working with refugee families in youth development and counseling, teen pregnancy prevention, family day care training, naturalization assistance and volunteer citizenship classes, English language training, social adjustment and advocacy.

The Association was awarded a grant for the project period from September 30, 1997 through September 29, 2000, in the amount of \$480,000. This total consisted of \$160,000 for each of the 3 years of the project period. The grant was awarded to provide refugee assistance that included citizenship classes, help with completion of naturalization applications, and referral services. To achieve the grant objectives the Association entered into collaborative agreements with five other organizations - Lao Family Community of Fresno, Lao Family Community of Merced, Lao Family Community of Stockton, Lao Family Community of Sacramento, and the Catholic-Diocese of Fresno.

OBJECTIVE, SCOPE, AND METHODOLOGY

The ORR grant (90RN0002) was selected for audit along with other discretionary grants awarded by ACF. The audit was performed in accordance with generally accepted government auditing standards. The objective of the audit was to determine if the Association achieved the grant objectives.

To accomplish the audit objective, we examined the Association's grant proposal, progress reports, policies and procedures, client files, and other supporting documentation. We also conducted interviews with the Executive Director.

We limited the scope of our review to an examination of the grant objectives. Therefore, we did not review the grantee's fiscal accountability or compliance with standard terms and conditions of the grant. We did not determine whether costs claimed under the grant were allowable. Our review of management controls was limited to those controls considered necessary to achieve our objective.

Our fieldwork was performed during July and August 2001 at Hmong American Women Association, Inc. in Fresno, California. We also made site visits to Lao Family Community of Fresno, Fresno, California, and Lao Family Community of Merced, Merced, California.

RESULTS OF AUDIT

The Association accomplished the two primary objectives of the grant. However, the Association's progress reports did not always include accurate statistics on the numbers of refugees served.

Grant Objectives

The grant had two primary objectives as follows:

Objective 1 Provide citizenship training for 630 refugees in the Fresno, Merced, Stockton, and Sacramento areas over the 3 years of the grant. The Association accomplished this by providing citizenship training to over 904 refugees.

Objective 2 Assist 1,350 refugees with the citizenship application process and referrals for other kinds of related services over the 3 years of the grant. The Association accomplished this by assisting over 1,400 refugees with the application process. This included assisting refugees with the initial applications and making follow-up inquiries.

Record Keeping

Although the Association submitted progress reports to ORR, the progress reports did not always contain accurate statistics on the numbers of refugees served. The ORR required the Association to submit quarterly progress reports in order to track progress toward the achievement of grant objectives. The Association's records were not sufficiently organized to ensure that progress reports could be relied on. The Association provided us with some documentation to support the reports. However, the documents provided were very unorganized, inconsistent from quarter to quarter, and did not accurately support the numbers in the reports. We were given access to additional documents in boxes, binders, and file cabinets. Using the additional documents, we were able to independently determine that the Association met its grant objectives.

Recommendation

We recommend that the Association improve its record keeping procedures to ensure that progress reports reflect the actual accomplishment of grant objectives.

Association Comments

The Association concurred with our recommendation. Additionally, the Association provided a record keeping improvement plan to ensure that progress reports reflect the actual accomplishment of grant objectives. The complete text of the Association's comments is included as the APPENDIX to this report.

Final determination as to actions taken on all matters reported will be made by the HHS action official named below. We request that you respond to the HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

To facilitate identification, please refer to Common Identification Number A-09-01-00106 in all correspondence relating to this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Ahlstrand". The signature is fluid and cursive, with a large initial "L" and "A".

Lori A. Ahlstrand
Regional Inspector General
for Audit Services

Attachments

Direct Reply to HHS Action Official:

**Mike Hill, ACF Audit Liaison
370 L'Enfant Promenade S.W.
Room 6th Floor East Aerospace Building
Washington, D.C. 20447**

APPENDIX



HMONG AMERICAN WOMEN
ASSOCIATION INC.

NON-PROFIT ORGANIZATION

November 15, 2001

Common Identification No. A-09-01-00106

Ms. Lori A. Ahlstrand
Regional Inspector General for Audit Services
Department of Health & Human Services, Region IX
Office of Audit Services
50 United Nations Plaza, Room 171
San Francisco, CA 94102

Dear Ms. Ahlstrand.

We sincerely apologize for the delay in responding to your draft Audit Report entitled, "Audit of Office of Refugee Resettlement Grant No. 90RN0002 for the Period September 30 1997 through September 29, 2000".

This Hmong American Women Association's *statement of concurrence* with the recommendation in the draft report. Attached is our record keeping improvement plan and procedures to ensure that progress reports reflect the actual accomplishment of the grant objectives.

If you have any question, please feel free to call me at (559) 251-9566.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Chi Kue".

Chi Kue
Executive Director

Enclosures

Common Identification No. A-09-01-00106

RECORD KEEPING IMPROVEMENT PROCEDURES**A. Objectives:**

1. To ensure eligibility to services according to ORR policies and regulations
2. To ensure accurate count on the number refugees served
3. To ensure the proposed services are provided, and
4. To ensure that progress reports reflect the actual accomplishment of grant objectives.

B. Procedures:

1. **Eligibility Determination:** Prior to receiving any services, each applicant is required to complete and Intake/Assessment form providing personal information such as service application date, name of the applicant, address, telephone, Alien Number, Social Security Number, Date of Entry and Date becoming a permanent resident, level of education, English skills and type of services requested. Each participant must be admitted to United States according to the Refugee Act of 1980, and must have become a permanent resident for at least two and half years. Verification of green card and social security number, and identification card is required.
2. **Client Files:** Each participant will have an individual file containing the following information/forms: intake/assessment, copy of verification of Alien Status, social security card, ID card, Pre/Post test result, attendance records, progress reports, referrals, and service records. All client information and files must be kept confidential. Each client file is counted as one client toward project goals.
3. **Services Documentation:** To ensure accomplishment of program objectives, project staff must enter a short narration for each type of services provided to each program participant chronologically from the intake assessment date to the closure of the case (entering the date, service needs, and services provided, including outcomes).
4. **Progress Reports:** To ensure that the progress reports reflect the actual accomplishment of grant objectives, HAWAII's Executive Director will verify each individual case file for completeness and proper documentation before counting as one client. Any found deficiency will be brought to attention of respective project staff member for timely corrective action. Project goals and grant objectives will be discussed at all monthly staff meetings, and individual support/training will be provided to staff needing additional information and necessary skills to handle the job effectively. Progress reports will include the types of services provided, and the number of participants during the month, and cumulative number up-to-date (from prior months), and any other information inquired by ORR.